## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: Monica Pelzer

**Debtor** :

CHAPTER 13

M & T Bank

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Movant : Case No. 19-16329-MDC

V.

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Monica Pelzer : 11 U.S.C. 362

**Respondent** 

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## ANSWER TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY

And now Monica Pelzer by her attorney, Stephen M. Dunne, Esquire answers the request for relief from the automatic stay and avers as follows:

- 1. Admitted.
- 2. Admitted.
- 3. Denied.
- 4. Admitted.
- 5. Admitted.
- 6. Denied. Debtor has made all mortgage payments due and payable. See attached Money Orders dated 03/02/2020 in the amount of \$550.00 and 03/26/2020 in the amount of \$551.00.
- 7. Denied.
- 8. Denied.
- 9. Denied.
- 10. Denied.
- 11. Denied.

WHEREFORE, debtor requests that the motion for relief from the automatic stay be denied.

Respectfully submitted,

Stephen M. Dunne, Esquire /s/ Stephen M. Dunne 1515 Market Street, Suite 1200 Philadelphia, PA 19102 215-551-7109 (O)